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Department of Energy

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FEB 07 1995

Mr. D. R. Sherwood  
Hanford Project Manager  
U.S. Environmental Protection Agency  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352

Mr. David Nylander  
Kennewick Activities Manager  
State of Washington  
Department of Ecology  
7601 West Clearwater Avenue, Suite 102  
Kennewick, Washington 99336

Dear Messrs. Sherwood and Nylander:

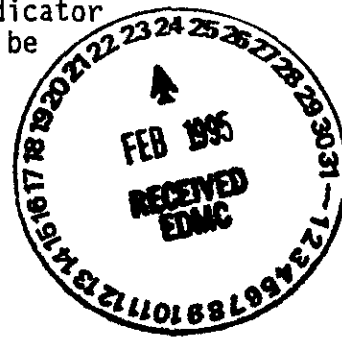
RESOURCE CONSERVATION AND RECOVERY ACT GROUNDWATER MONITORING PROGRAM CHANGES

The attached six Westinghouse Hanford Company (WHC) Engineering Change Notices (ECN) are prepared to document and justify changes in the facility groundwater monitoring plans supporting groundwater sampling and analysis for the Resource Conservation and Recovery Act (RCRA). This information supplements the RCRA groundwater monitoring plans and is a deliverable required by federal and state groundwater regulations.

The Hanford Site RCRA groundwater monitoring program contains 19 hazardous Waste Treatment Storage or Disposal Facilities and the Solid Waste Landfill and is the responsibility of the WHC RCRA and Operational Groundwater Monitoring Program. Changes in the sampling and analysis schedule are based on revisions negotiated with the respective project scientists for each site and will begin immediately with the next scheduled RCRA program quarterly sampling episode. All the change notices meet or exceed the minimum analytical requirements required under 40 CFR 265. The remaining 14 change notices will be forwarded when they are completed and the associated revised schedules will be implemented at the appropriate time.

The basic changes in the attached ECNs are based on the following rationale.

1. Radionuclides in Hanford groundwater are well characterized; thus more reliance can be made now on indicator measurements (e.g., gross alpha, gross beta, and tritium) to track plume movement. Accordingly, a large number of specific radioanalyses (e.g., strontium-90, isotopic uranium, gamma scan) have been replaced by indicator parameters. If indicator results are anomalously high, then specific radioanalyses will be considered.



Messrs. Sherwood and Nylander

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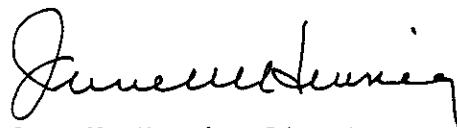
2. A large number of pesticides, herbicides and semi-volatile organic analyses (VOA) are no longer requested based on a long past history of negative results (particularly for Low-Level Burial Ground sites).
3. The origin of chlorinated hydrocarbons in the 200 West Area is clearly established and related to past-practice disposal sites. Expedited remediation, groundwater pump and treat, and additional characterization activities are under way at both 200-UP-1 and 200-ZP-1 operable units. Thus, sampling networks for these Environmental Restoration activities should establish baseline conditions prior to and during major remediation efforts. Accordingly, VOA is ceased at many of the 200 West Area RCRA facilities.

The RCRA program changes impact other Hanford Site groundwater monitoring programs (e.g., Site Wide Surveillance and the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) Programs which utilize the RCRA analytical results. Most of the changes involve only reducing the number of analytes. Cosampling by other groundwater programs is available to take advantage of scheduled sampling trips. Coordination with the site-wide surveillance and CERCLA groundwater programs is in progress.

These changes to the RCRA program will result in improved sampling and analytical efficiency, minimization of redundant results, and reduction of program cost.

Please direct questions regarding this submittal to Mr. M. J. Furman of my staff on (509) 376-7062.

Sincerely,



June M. Hennig, Director  
Waste Management Division

WPD:MJF

Enclosure

cc w/o encl:

J. W. Cammann, WHC

R. R. Thompson, WHC

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## Author

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## Addressee

D. R. Sherwood, EPA  
D. Nylander, Ecology

## Correspondence No.

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CHANGES

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